



Board of Commissioners
Jeff Horrocks • Gary D. Kofford • Laurie Pitchforth
75 East Main Street • P.O. Box 629 • Castle Dale, Utah 84513

FILED

OCT 27 2010

**SECRETARY, BOARD OF
OIL, GAS & MINING**

October 25, 2010

THE BOARD OF OIL, GAS AND MINING
DEPARTMENT OF NATURAL RESOURCES
IN AND FOR THE STATE OF UTAH
**DEPARTMENT OF NATURAL RESOURCES,
1594 WEST NORTH TEMPLE,
SALT LAKE CITY, UTAH**

Re:

Docket No. 2010-026 Cause No. C/015/0032F – In The Matter of the Request for Agency Action of Genwal Resources, Inc., Petitioner and Permittee; Division of Oil, Gas and Mining, Respondent – Request for Board Review of Division Order DO10A, Requiring Bonding for the Perpetual Treatment of Mine Water Discharge at the Crandall Canyon Mine in Emery County, Utah.

The Emery County Commission desires to make The Board aware of our interest in the proper and reasonable treatment of the water discharged from the Crandall Canyon Mine.

In conjunction with electrical power generation, coal mining is a major industry in Emery County and has contributed to the economic stability of our county for decades. Local government has been a strong partner in advocating for the mining industry and will continue to do so.

The Emery County General Plan states in part,

Emery County has one of the strongest rural economies in the nation. It is based on the extraction of coal from numerous local coal mines, and the conversion of that coal into electricity in five power generation units. This industrial base was built through millions of dollars of investment, its product is used in every home, hospital, school, and business in this and neighboring states.

However, as important as coal mining and power generation is to Emery County,

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it is not the most valuable resource. The same plan goes on to say that,

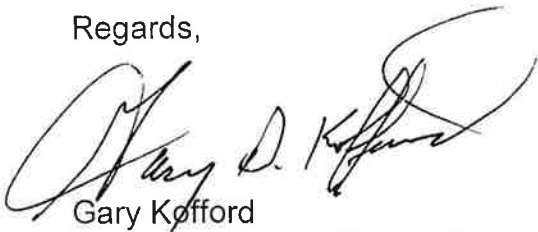
We recognize the value of our most scarce natural resource -- water.... Ultimately it is the availability of water that makes it possible to live on this arid land. It is water that makes it possible to grow our crops, to establish our communities, and to generate electricity in our power plants. Because of the scarcity of this basic resource, there is a fragile balance that makes survival possible.

Emery County is fortunate to have many valuable natural resources, and it is abundantly clear that the most valuable of those are water resources. Especially within the forest lands to the west which make up our watershed, all activity must be viewed through the lense of watershed health. The Emery County Plan also states that,

Any potential contamination of mountain water by sediment, chemicals, or waste, will be mitigated.... and... It shall be the County's policy to maintain excellent water quality of its streams. The current excellent quality shall be the minimum level.

Emery County encourages The Board to assist us in maintaining a healthy watershed by assuring adequate mitigation to the water discharge from the Crandall Canyon Mine.

Regards,

A handwritten signature in black ink, appearing to read "Gary D. Kofford". The signature is fluid and cursive, with a large initial "G" and "K".

Gary Kofford
Chairman, Emery County Commission